

Number of Respondents

Year	Respondents That Submit Reports		Respondents That Do Not Submit Any Reports		
	(A) Number of New Respondents	(B) Number of Existing Respondents	(C) Number of Existing Respondents that keep records but do not submit reports	(D) Number of Existing Respondents That Are Also New Respondents	(E) Number of Respondents (E=A+B+C-D)
1	0	406	450	0	856
2	0	406	450	0	856
3	0	406	450	0	856
Average	0	406	450	0	856

Total Annual Responses				
(A) Information Collection Activity	(B) Number of Respondents	(C) Number of Responses	(D) Number of Existing Respondents That Keep Records But Do Not Submit Reports	(E) Total Annual Responses E=(BxC)+D
Application for construction, reconstruction, and modification	53	1	0	53
Notification of applicability (one-time)	0	0	0	0
Notification of construction/reconstruction	12	1	0	12
Notification of modification	41	1	0	41
Notification of anticipated startup	53	1	0	53
Notification of actual startup	53	1	0	53
Notification of performance test	5	1	0	5
Notification of compliance status	0	0	0	0
Notification of increased annual VHAP usage	0	0	0	0
Semiannual compliance status reports (compliant coatings) ^e	365	2	0	730
Semiannual compliance status reports (control devices) ^f	39	2	0	78
Quarterly excess emissions reports	2	4	0	8
Records for incidental and area sources	0	0	450	450
			Total	1,483

Table 1: Annual Respondent Burden and Cost – NESHAP for Wood Furniture Manufacturing Operations (40 CFR Part 63, Subpart JJ) (Renewal)

Burden Item	A	B	C	D	E	F	G	H
	Technical person-hours per occurrence	No. of occurrences per respondent per year	Technical person-hours per respondent per year (AxB)	Respondents per year ^a	Technical hours per year (CxD)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)	Total cost per year (\$) ^b
1. Applications for construction, reconstruction, and modification ^c	4	1	4	53	212	10.6	21.2	26,696.84
2. Surveys and studies	N/A							
3. Reporting requirements								
A. Familiarization with the regulatory requirements	1	1	1	856	856	42.8	85.6	107,794.80
B. Create information ^d	See 4D							
C. Gather existing information	See 3D							
D. Write reports								
Notification of applicability (one-time) ^a	2	1	2	0	0	0	0	0.00
Notification of construction/reconstruction ^c	2	1	2	12	24	1.2	2.4	3,022.28
Notification of modification (physical/operational changes) ^c	8	1	8	41	328	16.4	32.8	41,304.55
Notification of anticipated startup (including reconstruction and modification) ^c	2	1	2	53	106	5.3	10.6	13,348.42
Notification of actual startup ^c	2	1	2	53	106	5.3	10.6	13,348.42
Notification of performance test ^c	2	1	2	5	10	0.5	1	1,259.29
Notification of compliance status	Included in semi-annual compliance status report counts.							
Notification of increased annual VHAP usage ^d	2	1	2	0	0	0	0	-
Semiannual compliance status reports (compliant coatings) ^e	4	2	8	365	2,920	146.0	292.0	367,711.22
Semiannual compliance status reports (control devices) ^f	4	2	8	39	312	15.6	31.2	39,289.69
Quarterly excess emissions reports ^g	4	4	16	2	32	1.6	3.2	4,029.71
Subtotal for Reporting Requirements						5,642		617,805
4. Recordkeeping requirements								
A. Familiarization with the regulatory requirements	See 3A							
B. Plan activities	N/A							
C. Implement activities	N/A							
Prepare work practice standards implementation plan ^h	8	1	8	53	424	21.2	42.4	53,393.68
Prepare leak inspection and maintenance plan ^h	8	1	8	53	424	21.2	42.4	53,393.68
Formulation assessment plan ^h	8	1	8	53	424	21.2	42.4	53,393.68
D. Time to enter information								
Records of applicability ⁱ	1	1	1	53	53	2.7	5.3	6,674.21
Records of performance test ^c	1	1	1	5	5	0.3	0.5	629.64
Records of types and quantities of materials used, including VHAP, VOC, viscosity and solids content data ^j	1.5	12	18	856	15,408	770.4	1540.8	1,940,306.33
Records of formaldehyde content ^k	2	12	24	150	3,600	180	360	453,342.60
Records of CMS parameters ^l	1.5	52	78	41	3,198	159.9	319.8	402,719.34
Records of monthly averaging calculations ^m	2	12	24	91	2,184	109.2	218.4	275,027.84
Records of operators training work practice ⁿ	1	1	1	856	856	42.8	85.6	107,794.80

Records of other work practices (inspection and maintenance, solvent accounting, formulation assessment) ^o	2	12	24	856	20,544	1,027.2	2,054.4	2,587,075.10
Records of semi-annual reports and supporting calculations ^{e,f}	1	2	2	404	808.0	40.4	80.8	101,750.23
Records of quarterly reports and supporting calculations ^g	1	4	4	2	8.0	0.4	0.8	1,007.43
Records of start-up, shutdown and malfunction ^o	2	12	24	4	96.0	4.8	9.6	12,089.14
E. Records for incidental and area sources ^q	1	12	12	450	5,400	270	540	680,013.90
F. Annual personnel refresher course ⁿ	8	1	8	406	3,248	162.4	324.8	409,015.77
G. Audits	N/A							
Subtotal for Recordkeeping Requirements						65,182		7,137,627
TOTAL ANNUAL BURDEN AND COST (rounded)^r						70,800		7,760,000
TOTAL CAPITAL AND O&M COST (rounded)^r								24,600
GRAND TOTAL (rounded)^r								7,780,000

47.7 hrs/response

a EPA estimates 406 existing major sources and 450 existing incidental/area sources will be subject to the standard. No new major or area sources will become subject over the next 3 years therefore the one-time notification of applicability requirement does not apply. Modified or reconstructed sources will submit their applicability notifications as part of their notifications of construction or modification. We assume that each source subject to the standard will have to familiarize with the regulatory requirements each year.

b This ICR uses the following labor rates: \$112.98 (technical), \$149.35 (managerial), and \$54.81 (clerical). These rates are from the United States Department of Labor, Bureau of Labor Statistics, June 2017, "Table 2. Civilian workers, by occupational and industry group." The rates are from column 1, "Total compensation." They have been increased by 110 percent to account for the benefit packages available to those employed by private industry.

Table 2: Average Annual EPA Burden and Cost – NESHAP for Wood Furniture Manufacturing Operations (40 CFR Part 63, Subpart JJ) (Renewal)

	A	B	C	D	E	F	G
Burden Item	Technical person-hours per occurrence	No. of occurrences per respondent per year	Technical person-hours per respondent per year (AxB)	Respondents per year ^a	Technical hours per year (CxD)	Management hours per year (Ex0.05)	Clerical hours per year (Ex0.10)

H
Total cost per year (\$) ^b